

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: § § CASE NO. 15-35615
RAAM GLOBAL ENERGY COMPANY, § § (Chapter 11)
et al. § § JOINTLY ADMINISTERED
DEBTORS. §

**NOTICE OF FILING OF PROPOSED ORDERS
FOR HEARING ON JANUARY 19, 2016**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit the following:

- (a) proposed *Order (a) Approving Offer to Purchase, (b) Authorizing the Debtors to Sell Oil and Gas Properties in California Free and Clear of All Rights, Liens, Claims, Interests, and Encumbrances, and (c) Granting Related Relief*, attached hereto as Exhibit A;
- (b) proposed *Order (i) Authorizing and Approving the Debtors to Sell Substantially All of Their Property Free and Clear of All Rights, Liens, Claims, Interests, and Encumbrances, (ii) Authorizing the Debtors to Assume and Assign Certain Executory Contracts and Unexpired Leases, and (iii) Granting Related Relief*, attached hereto as Exhibit B, with a redline thereof to the version attached to the applicable motion attached hereto as Exhibit C; and
- (c) proposed *Order Confirming Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code*, attached hereto as Exhibit D.

PLEASE TAKE FURTHER NOTICE that the proposed orders set forth above are subject to change and certain provisions are still being negotiated.

Dated: January 18, 2016

Respectfully submitted,

VINSON & ELKINS LLP

By: /s/ Reese A. O'Connor
Harry A. Perrin, SBT # 1579800
John E. West, SBT # 21202500
Reese A. O'Connor, SBT # 24092910
First City Tower
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: 713.758.2222
Fax: 713.758.2346
hperrin@velaw.com; jwest@velaw.com
roconnor@velaw.com

and

William L. Wallander, SBT # 20780750
Bradley R. Foxman, SBT # 24065243
Trammell Crow Center
2001 Ross Avenue, Suite 3700
Dallas, Texas 75201
Tel: 214.220.7700
Fax: 214.999.7787
bwallander@velaw.com; bfoxman@velaw.com

ATTORNEYS FOR THE DEBTORS